

THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re: Nicholas Zindel Epps  
Debtor

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CASE NO. 21-10317-MDC

Nicholas Zindel Epps,  
Movant  
v.

CHAPTER 13

Pennymac Loan Services, LLC,  
Respondent

and

William C. Miller, Esquire  
Chapter 13 Trustee

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**STIPULATION REGARDING PAYMENT OF CLAIM 8 BY AND BETWEEN  
DEBTOR AND PENNYMAC LOAN SERVICES, LLC**

THIS matter being opened to the Court by way of claim no. 8 filed by Pennymac Loan Services, LLC by way of its counsel at KML Law Group, P.C. and the proposed amended plan filed by Debtor by way of his counsel Joseph Quinn of Ross, Quinn, & Ploppert, P.C.,

The Parties agree to the following:

1. On March 31, 2021 Pennymac Loan Services, LLC ("Pennymac") filed a valid claim, marked as claim no. 8, secured by Debtor's real estate known as 3 East Brown Street, Norristown, PA 19401.
2. Pennymac's claim reflects pre-petition arrearage of \$16,881.90.
3. Prior to the filing of the petition, Debtor and Pennymac Loan Services, LLC had entered into a COVID-19 loan forbearance that did not require Debtor to pay the \$1,542.03 monthly payment ordinarily due on March 1, 2021 and April 1, 2021.
4. Debtor subsequently proposed a plan that repays Pennymac the \$16,881.90 in pre-petition arrears and \$3084.06 in post-petition arrears due Pennymac.

5. Pennymac agrees to repayment of the \$3,084.06 in post-peition arrears in the plan for total payment of \$19,965.96.

6. Pennymac shall not be required to amend its claim to receive the payment of \$19,965.96 from the plan.

7. The undersigned attorneys have authority to sign such stipulation on behalf of the respective Party.

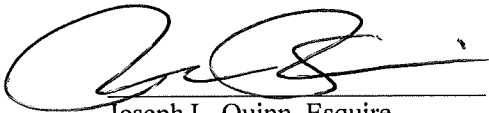
8. Electronic signature and/or facsimile of signatures are acceptable and valid signatures.

/s/Rebecca A. Solarz

Rebecca A. Solarz, Esquire  
KML Law Group, P.C.  
rsolarz@kmlawgroup.com  
Tel: (215) 825-6327  
Attorney for PennyMac Loan Services, LLC

6/16/2021

Date



Joseph L. Quinn, Esquire  
Ross, Quinn & Ploppert, P.C.  
Tel: (610) 323-5300  
jqquinn@rqplaw.com  
Attorney for Debtor

6/17/2021  
Date

No Objection - Without Prejudice to  
Any Trustee Rights or Remedies

/s/ LeeAne O. Huggins


LeeAne O. Huggins, Esquire  
for William C. Miller  
Chapter 13 Standing Trustee  
mdc@ph13trustee.com  
Phone: (215) 627-1377

June 21, 2021

Date

And it is SO ORDERED:

June 22, 2021

  
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MAGDELINE D. COLEMAN  
CHIEF U.S. BANKRUPTCY JUDGE